

## **Remarks**

Claims 100-119 stand rejected and remain pending. No claims are amended herein. The Applicant respectfully requests allowance of claims 100-119.

### **Claim Rejection Under 35 U.S.C. § 103**

Claims 100-119 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2002/0046255 to Moore et al. (hereinafter “Moore”) in view of U.S. Patent No. 5,991,381 to Bouanaka et al. (hereinafter “Bouanaka”). (Page 2 of the Office action.) The Applicant respectfully traverses the rejection on the basis of the following discussion.

Method claim 100 provides, in part, “*in a first one of the web-sites, interacting with a first one of the end-users over the Internet, and in response, transferring a first communication account request over the Internet to an account server....*” (Emphasis supplied.) Further, claim 100 provides “*in the account server, validating the first web site in response to receiving the first communication account request ... and transferring the first account code over the Internet to the first web site.*” System claim 110 incorporates similar provisions. The Office action alleges that the interacting and transferring limitations are taught in Moore, while indicating that Bouanaka teaches the validating operation. (Page 3 of the Office action.) The Applicant respectfully disagrees with these allegations, as the combination of Moore and Bouanaka neither teaches nor suggests any of these limitations.

### *Account Server, and Communication Therewith*

Generally, Moore discloses an open network architecture system 100 which “is accessible via a network connection through the network 110, such as the Internet, for allowing a plurality of customers, such as individual end-users having a web browser, to ubiquitously access the system 100 for purchasing prepaid services and/or usage rights thereof, and managing and viewing their prepaid online accounts, etc. in real-time. ... The system 100 is associated with one or more web-sites having corresponding URLs for enabling the plurality of customers to interface with the system 100 via the network 110.” (Paragraph [0026] and Fig. 1.) Further, “[e]ach of the web-sites is maintained by web-site system hardware 120,” which comprises part

of the system 100 and performs the various functions of the system. (Paragraph [0027] and Fig. 1.) One of these functions is “managing a plurality of databases connected to the web-site system hardware 120.” (Id.) Thus, the end-users communicate with the web-site system hardware 120, which directly supplies the prepaid services without communication with another system or server. Therefore, Moore does not teach or disclose “in a first one of the web-sites, ... transferring a first communication account request over the Internet to an account server,” as provided for in claim 100, and incorporated similarly into claim 110, since Moore does not disclose a separate account server, much less a website *and* an account server *communicating over the Internet*.

Moore also discusses allowing customers of outside system operators to utilize the system 100 by way of network hardware 180, such as a server and a gateway coupled to the web-site system hardware by way of a *dedicated link*, and hence not over the Internet. (Paragraph [0041].) The network hardware 180 thus allows the operators to offer their own prepaid services by way of the system 100. (Paragraph [0041].) In the same fashion as described above, the end-user interfaces “with the web-site system hardware 120 via a web-site associated with the website system hardware 120 and personalized for the outside system operator(s).” (Paragraph [0042].) Moore also proposes hyperlinking the customer to the web-site system hardware 120 via the operator’s own website. (Paragraphs [0041] and [0044].) Hyperlinking thus brings the end-user in direct communication with the web-site system hardware 120. Therefore, in the case of an outside system operator, Moore does not teach or suggest a separate account server, or communications between a web-site and an account server over the Internet, as provided for in claims 100 and 110 of the present application.

The Office action indicates that paragraphs [0010; 0016] of Moore teach a website transferring a first communication account request over the Internet to an account server in response to interaction between an end-user and the website. (Page 3 of the Office action.) However, paragraph [0010] only describes a subscriber accessing a signaling agent’s website to purchase additional time for a service, while paragraph [0016] generally describes the system shown in Fig. 1, which contains several databases coupled with the web-site system hardware 120, and “a network [110], such as the Internet, for providing customers with ubiquitous access to the databases for viewing and managing prepaid online accounts....” No mention is made of a separate account server, or communication between the website and the account server of a

communication account request over the Internet.

#### *Website Validation*

As indicated in the Office action, Moore does not teach or suggest “in the account server, *validating the first web site* in response to receiving the first communication request.” (Page 3 of the Office action.) However, the Office action alleges that “Bouanaka teaches a server that *validates a request* in response to receiving a communication account request (figure 2: 40).” (Page 3 of the Office action; emphasis supplied.) The Applicant respectfully notes two problems with this allegation. For one, whether Bouanaka validates *a request* is unimportant, as claim 100 provides for validation of *the website* transferring the communication account request over the Internet to the account server, *not* the request itself.

Secondly, the Applicant respectfully contends that Bouanaka does not teach or suggest the validation of such a website. Generally Bouanaka discloses “[a] calling card validation method and system for automatically issuing calling cards and placing charges on customer’s telephone bill.” (Abstract.) To this end, a calling card computer terminal 18 of a computer system 10 receives a user’s request for a calling card, processes the request, and issues a calling card request message (CCRM) to a database server 26 of a telephone system 20. (Fig. 1; operations 30-38 of Fig. 2, and column 3, lines 35-65.) In response, the database server 26 accesses a database containing customer account and billing information so that the charges for the calling card may be added to the customer’s telephone account. (Fig. 1; operations 40-48 of Fig. 2; and column 3, line 66, to column 4, line 6.) Thus, in Bouanaka *the existence of the customer’ telephone account* is being validated, not a website, and not the request for a calling card. (See, for example, operation 40 of Fig. 2, which discloses the operation of “search[ing] telephone database for *telephone account validation*.”) (Emphasis supplied.) In fact, Bouanaka does not appear to mention websites at all, much less their validation. Thus, Bouanaka does not teach or suggest validation of a website, as provided for in claim 100, and such indication is respectfully requested.

#### *Motivation to Combine Moore and Bouanaka*

The Office action also indicates that “[a]t the time the invention was made, one of ordinary skill in the art would have been motivated to *validate a website in response to receiving*

*a request in order to process [the] user's request automatically, thus allowing users to access the resource."* (Page 3 of the Office action.) The Applicant respectfully disagrees for two reasons. The websites of Moore does not appear to require any kind of validation since all of the websites disclosed therein are hosted on a single website system hardware 120. Further, Moore appears to already process user requests for communication service at least as automatically as Bouanaka. Thus, the Applicant asserts that no motivation exists to combine Moore with Bouanaka, and such indication is respectfully requested.

Given the foregoing, the Applicant asserts that claims 100 and 110 are allowable in view of the combination of Moore and Bouanaka for at least the reasons provided above, and such indication is respectfully requested.

Claims 101-109 depend from independent claim 100, and claims 111-119 depend from independent claim 110, thus incorporating the provisions of their corresponding independent claims. Thus, the Applicant contends that claims 101-109 and 111-119 are allowable for at least the same reasons provided above regarding claims 100 and 110, and such indication is respectfully requested.

Therefore, in light of the reasons set forth above, the Applicant respectfully requests that the 35 U.S.C. § 103(a) rejection of claims 100-119 be withdrawn.

## Conclusion

Based on the above remarks, the Applicant submits that claims 100-119 are allowable. Additional reasons in support of patentability exist, but such reasons are omitted in the interests of clarity and brevity. The Applicant thus respectfully requests allowance of claims 100-119.

The Applicant believes no fees are due with respect to this filing. However, should the Office determine additional fees are necessary, the Office is hereby authorized to charge Deposit Account No. 21-0765 accordingly.

Respectfully submitted,

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/Kyle J. Way/

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